OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER

2003 – 2004 ANNUAL REPORT

As we are forced more and more each day to leave documentary fingerprints and footprints behind us, and as these are increasingly put into storage systems capable of computer retrieval, government may acquire a power-through-date position that armies of government investigators could not create in past eras

(*Privacy and Freedom*, Alan F. Westin, Athenium, 1967, p. 158)

What access and privacy laws do is make a transfer of power, in effect, from the state to the citizen. Under privacy legislation, you have a right to see the information that the government holds on you. Under Access to Information laws, you have the right to see information about what government is actually doing. It is a transfer of information. It is a transfer of power. It is an empowering of the citizen; it is a diminution of the power of the bureaucracy.

(*E-Government Reconsidered: Renewal of Governance for the Knowledge Age*, edited by Lynn Oliver and Larry Sanders, University of Regina, 2004, Hon. John M. Reid p. 79)

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June 28, 2004

Hon. Mr. P. Myron Kowalsky
Speaker of the Legislative Assembly
129 Legislative Building
Regina, Saskatchewan
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Dear Mr. Speaker:

I have the honour to submit my 2003-2004 Annual Report to be laid before the Legislative Assembly in accordance with the provisions of Section 62(1) of *The Freedom of Information and Protection of Privacy Act*.

Respectfully submitted,

R. Gary Dickson, Q.C.
Information and Privacy Commissioner

104-06103/

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INTRODUCTION

Commencing November 1, 2003 the Information and Privacy Commissioner became a full-time position and resources were provided to enable a stand-alone office for the first time in the 11 years since *The Freedom of Information and Protection of Privacy Act* was proclaimed in Saskatchewan. This report therefore addresses the last seven months of the term of Acting Information and Privacy Commissioner Mr. Richard Rendek, Q.C. and the ensuing five months of the new full-time Commissioner, Mr. Gary Dickson, Q.C.

From the date *The Freedom of Information and Protection of Privacy Act* was proclaimed in 1992 until 2003, the Commissioner was a part-time position. There was no office and only very modest resources available to the part-time Commissioner. As a result, the past Commissioners did an excellent job of addressing requests for review of decisions of government institutions or local authorities but were not in a position to address other parts of the statutory mandate such as public education and advice to government institutions or local authorities on compliance.

MANDATE OF THE COMMISSIONER

There are four elements in the Commissioner's mandate defined by *The Freedom of Information and Protection of Privacy Act* (FOIP), *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP) and *The Health Information Protection Act* (HIPA)[1]:

1. The Commissioner responds to requests for review of those decisions made by government institutions, local authorities or health information trustees in response to access requests and makes recommendations to those bodies.
2. The Commissioner responds to complaints from individuals who believe their privacy has not been respected by government institutions, local authorities or health information trustees and makes recommendations to those bodies.
3. The Commissioner provides advice to government institutions, local authorities or health information trustees on legislation, policies or practices that may impact access or privacy rights.
4. The Commissioner undertakes public education with respect to information rights including both access to information and protection of privacy.

The vision of our office is that the people of Saskatchewan shall enjoy the full measure of the information rights that have been affirmed by the Legislative Assembly of Saskatchewan.

[1] Available online at www.oipc.sk.ca

ACKNOWLEDGEMENTS

We wish to acknowledge the leadership and wisdom of Saskatchewan legislators in creating a full-time Information and Privacy Commissioner office. For the first time in 11 years, the Commissioner will now be able to address all aspects of the statutory mandate.

The full-time office has been a recommendation of previous Commissioners, most recently former Commissioner, Mr. Richard Rendek, Q.C., as expressed in his 2002-2003 Annual Report. The decision was made in 2003 to do what other Canadian provinces and territories do and appoint a full-time Commissioner as an Independent Officer of the Saskatchewan Legislative Assembly. Mr. Rendek not only advocated for the increased resources but also has provided essential assistance to the current Commissioner in securing office space, the recruitment of staff and generally facilitating the transition from a part-time to a full-time position.

The new Commissioner has received excellent cooperation and support from the Deputy Minister of Executive Council, the Deputy Minister of Justice and from the Deputy Minister of Health and their respective departmental staff. The Department of Justice is responsible for administering the FOIP *(Freedom of Information and Protection of Privacy Act)* and LA FOIP *(Local Authority Freedom of Information and Protection of Privacy)* Acts and Health is responsible for administering the HIPA *(Health Information Protection Act)*.

The Legislative Assembly Office provides us with legal, administrative, financial, Library resources and information technology support. We are grateful to Ms. Gwenn Ronyk, Clerk of the Legislative Assembly Office, and her able staff for all of their substantial help in setting up our new office.

We have also benefited from the counsel and support of other Independent Officers of the Legislative Assembly. We note in particular the many different kinds of assistance received from the Provincial Auditor's office in both the establishment of our office and in the substantive areas of our work where it is complementary to the mandated work of the Provincial Auditor.

Generally speaking, our experiences with local authorities, health information trustees and government institutions have been very positive. We have found that our advice and input is often solicited and then thoughtfully considered. Our early experience is that public sector employees are anxious to do the 'right thing' and are eager for more assistance in understanding just what these laws require of them.

Our office is much stronger with the addition of Pamela Scott, as Office Manager and Diane Aldridge as Assistant to the Commissioner.

ACCOMPLISHMENTS AND INITIATIVES

RECRUITMENT OF STAFF

The initial challenge was the recruitment of staff for our new office. Our Office Manager was initially seconded from the Legislative Assembly Office and became an employee of the office effective March 1, 2004. The Assistant to the Commissioner commenced employment March 18, 2004.

E-NEWSLETTER – THE SASKATCHEWAN FOIP FOLIO

The FOIP FOLIO is an e-newsletter produced by the Office of the Saskatchewan Information and Privacy Commissioner ("OIPC"). The purpose is to keep subscribers up-to-date on reports and recommendations from the OIPC. It features best practices, tips and shortcuts, and access/privacy developments in Saskatchewan, other parts of Canada and sometimes beyond.

Each month the FOIP FOLIO includes a wide variety of topics aimed at different segments of Saskatchewan's population, professional and public. Some past headlines include: *Saskatchewan Crown Corporations and PIPEDA*; *Duty to Assist;* and *A Cautionary Note for Pharmacists and other Trustees*.

Presently, our office has over 1000 subscribers to this e-newsletter. In addition, the FOIP FOLIO is accessible to anyone via our website (www.oipc.sk.ca). To become a subscriber, our office requires only an e-mail address.

HELPFUL TIPS

To assist applicants, local authorities and government institutions in preparation for a formal review, we produced a *Helpful Tips* document. This provides information on how to prepare the "Record" and a "Submission" for the purposes of the review under FOIP and LA FOIP.

ACCOMPLISHMENTS AND INITIATIVES (CONTINUED)

OIPC WEBSITE

We created a website that is now receiving an average of 179 "hits" per day. This has proven to be an effective vehicle for providing an array of information on access and privacy issues to public sector employees and the Saskatchewan public. The website includes the following features:

- Links to the three laws overseen by our office and corresponding regulations
- Links to more than 30 provincial, national and international access/privacy websites
- Reports issued by our office under FOIP, LA FOIP or HIPA
- Tools such as a *Privacy Impact Assessment* document, a *Helpful Tips* sheet for reviews and *Guidelines for Video Surveillance*
- Archived copies of our E-newsletter- the *Saskatchewan FOIP FOLIO*

NEW FORMAT FOR REPORTS UNDER PART VII OF FOIP ACT

Formerly, past reports were only accessible from the Commissioner in Regina or the Court House Library in Regina. Most of our Reports under Part VII of the Act will now be added to our website: www.oipc.sk.ca under the heading "Reports". We believe there is important educative value in making these reports more widely available. It should provide more guidance to FOIP Coordinators in government institutions and applicants alike in how the Act is interpreted.

Similar to the approach in most other Canadian jurisdictions, our reports will not identify the applicant/complainant. This is consistent with our view that access is a fundamental right of Saskatchewan residents and they should not be required to forfeit their privacy when they choose to assert an information right. We will normally identify the government institution or local authority consistent with the value of promoting greater accountability of government through greater transparency.

We have adopted a new format that will make it possible to access OIPC findings through internet data search services.

CONSTITUENCY OFFICE ACCESS AND PRIVACY GUIDE

We developed the *Constituency Office Access and Privacy Guide* and distributed this document to all 58 constituency offices of Members of the Legislative Assembly.

ACCOMPLISHMENTS AND INITIATIVES (CONTINUED)

PUBLIC AWARENESS

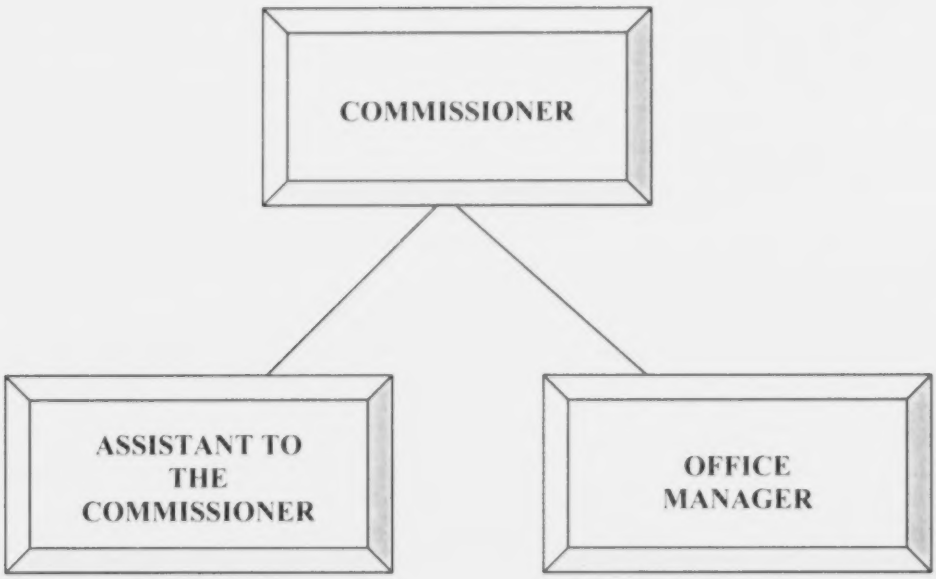
Conducting public education programs and providing information concerning the provincial access and privacy laws is part of the mandate of the OIPC.

As of March 31, 2004, our office had provided approximately 47 public education presentations in communities throughout Saskatchewan. Appendix B is a sample list of organizations that have received such a presentation. Any organization may request a public education program on the provincial statues, FOIP, LA FOIP, and HIPA, or a general privacy orientation session by contacting our office. Our office coordinates with each organization to arrange the event including preliminary discussions to customize the session to meet the organization's specific needs. This is challenging with the small staff of the OIPC. At present, the office must respond on a first come, first serve basis.

INVESTIGATION

We have initiated an investigation into the collection, use and disclosure of personal health information by the Saskatchewan Cancer Agency in respect to the Cervical Cancer Screening Program.

ORGANIZATIONAL STRUCTURE



HOW TO MAKE AN ACCESS REQUEST

Freedom of Information and Protection of Privacy Act (FOIP)
& *Local Authority Freedom of Information and Privacy Act*
(LA FOIP)

Step #9
Within 30 days upon receiving the decision in #8, the applicant or a third party may appeal the decision to Court of Queen's Bench.

Step #8
The public body will decide whether or not to follow the recommendations and inform those involved.

Step #7
If necessary, upon the completion of a formal review, the Information and Privacy Commissioner will offer recommendations to the public body.

Step #6
Pursuant to the FOIP/LA FOIP Acts, the Information and Privacy Commissioner's office will review and attempt to settle the complaint informally (ie. mediation) first.

Step #5
If full access to the request is granted the process ends. If dissatisfied with other results, you may request a review by the Information and Privacy Commissioner of Saskatchewan.

Step #4
Wait for a response. Within 30 days, the public body must provide access, transfer the request, notify you of an extension of the time limit, or deny access. Additional fees may be required.

Step #3
If a formal request is necessary, access the proper form. Complete and send in the form and application fee (if applicable). Forms available from the public body or from our website: www.oipc.sk.ca.

Step #2
Call the Public Body's FOIP Coordinator to see if you can get the information without filing a formal information access request. Be as specific as you can on what you are requesting access to. The record may or may not exist.

Step #1
Determine which public body (government institution or local authority) should receive the access to information request. Records must be in the possession or control of the public body for you to make the request.

ADMINISTRATION OF THE FOIP ACT

The Access Directory

The Department of Justice has produced an excellent publication - the *Access Directory*. It is written in plain language and provides a good deal of useful information to simplify the operation of the FOIP Act. This includes *useful terms in the directory*, description of common records, *how to make a request under the Act* and *how to request a review of a decision* and copies of the relevant forms. The *Access Directory* has been widely distributed throughout the province and appears to be readily available to Saskatchewan residents.

The current *Access Directory* was published in 2000. Some of that information is now out of date. Departments have changed names and/or addresses. There is a need to update the *Access Directory* so that it is complete and accurate for 2004. Ideally, the Department should produce an electronic version that can easily and quickly be revised when changes occur. This has been done in other provinces and obviates the need to produce the much more expensive paper version.

The Need for Written Guidelines as Resource for Government Institutions

Justice should consider producing a guide for government institutions in meeting their obligations under the FOIP Act. This would explain and clarify the technical requirements of the FOIP Act by use of examples, formal reports of our office and Saskatchewan court decisions that interpret the Act and regulations. Such a guide has proven an essential resource in other Canadian jurisdictions.

We note in the Deloitte Touche *Privacy Assessment* of 2003, reference to a paucity of written materials for Justice employees. "*Justice does not rely on codified policies and procedures, but rather make use of informal arrangements and cultural norms to employees FOI requirements re the handling of personal information*" [p.131] and "*For the most part, Divisions orally communicate policies and expectations with respect to the handling of personal information to new employees as part of their orientation process.*" [p. 131] and "*Although high level policy and procedures are set out in Justice manuals, most Divisions candidly admit they are lacking in specific policy and training with respect to privacy issues*" and "*Steps have been taken to ensure that employees are cognizant of the requirements of FOI, however, little policy is in evidence to which an employee may refer for guidance*" [page 132] and "*A wide range of professional and program staff deal with requests for access to personal information. Regular employee supervision is the sole means utilized to monitor compliance with the principles of FOI* [p. 133].

ADMINISTRATION OF THE FOIP ACT (CONTINUED)

The Need for Written Guidelines as Resource for Government Institutions (con't)

We have not had an opportunity to investigate these conclusions in the *Privacy Assessment* but intend to explore these concerns with Justice in 2004-2005 to ensure that the appropriate materials are available. Even if Justice has succeeded in establishing a culture within the Department of respecting information rights, and we have seen some evidence of that, that Department has an important leadership role for all of Executive Government and we have not seen satisfactory evidence of such a culture in all other departments.

Review of List of Government Institutions

We note that Investments Saskatchewan is not included in the FOIP Regulation that enumerates those bodies that are considered as "government institutions" for purposes of the Act. A review of the list of more than 70 bodies to ensure that it is complete and up-to-date would be an important part of the full legislative review we have recommended in another part of this Report. Going forward, we urge Justice to develop a procedure for regular review of the list of government institutions to supplement the list as appropriate.

Saskatchewan Justice Annual Report 2002-2003

This is a very important tool for our office and Saskatchewan residents to assess the effectiveness of the FOIP regime in this province. The statistical information in particular is invaluable in identifying trends and patterns.

We note there is no legislative requirement for Justice to report on the operation of the LA FOIP Act. No other department has that responsibility. We recommend that so long as there is a separate LA FOIP Act, (we recommend that they should be fully integrated into a single instrument), there should be a required report on the administration of the LA FOIP Act to parallel the Annual Report from Justice on the FOIP Act. This may be a matter for joint consideration of Justice and the Department of Government Relations and Aboriginal Affairs since the latter department is already engaged in supporting the activities of urban and rural municipalities in the province.

ADMINISTRATION OF THE FOIP ACT (CONTINUED)

Revision of Forms and Access to Forms

The access request forms are not available online in a format that allows downloading. The Justice website should be revised to make the forms available for downloading. We note that the Justice site already has a set of on-line forms for Public Guardian and Trustee, and Corporations Branch and presumably could easily do the same thing for FOIP forms.

There is no form for making a complaint of breach of privacy independent of a request for review. Our office is developing a complaint form but this should ideally be addressed by Justice as part of a review of all FOIP Act forms.

The *Access to Information Request Form* should contain a date when the form is completed not just a date when it is received. This allows our office to better monitor the length of time it takes for government institutions to initially process an access request.

TRAINING AND COMPLIANCE SURVEY

Our office surveyed all government departments in December 2003 on several key questions related to training and statutory compliance issues. The key findings are as follows:

- In only 9 of the 17 reporting departments, is the same person designated as the FOIP Coordinator and the Privacy Officer for purposes of the *Privacy Framework*.[2] In 8 departments, the positions are separate and occupied by different individuals.

- The Public Service Classification level for FOIP Coordinator/Privacy Officer ranges from an "in-scope" Level 6 to a Management Level 13.

- The FOIP Coordinator and Privacy Officer work:
  - Closely together – 14 departments
  - Occasionally together – 2 departments
  - Rarely together – 1 department

- 12 of the 17 departments reported that the in-service or orientation training on FOIP obligations over the last 3 years provided to managers and senior staff took the form of Privacy Framework workshops delivered by the Public Service Commission.

- There has been little or no in-service or orientation training on FOIP Act obligations independent of the Privacy Framework workshops. The notable exception is the Department of Health that provided mandatory sessions for all management and staff on privacy issues including FOIP in the summer and fall of 2002. In addition, all new employees are expected to participate in orientation sessions held quarterly which includes a detailed review of policy. This information is available on the Health Department Intranet.

- In response to the question, *Have you prepared brochures, checklists, pamphlets, guidelines for staff with respect to FOIP Compliance?*, only 5 departments provided an affirmative response. Those 5 departments are: Community Resources and Employment, Environment, Finance, Health and Learning.

[2] Available online at www.privacy.gov.sk.ca

TRAINING AND COMPLIANCE SURVEY (CONTINUED)

- Only 3 departments reported that their FOIP Coordinator is invariably engaged or consulted in the development of new programs or legislation that may impact access to information or privacy. Eight departments claim that this is a routine practice. Four departments reported this is seldom done. Four departments reported this is never done.

- No department FOIP Coordinator has completed or is registered in the excellent distance learning Information Access and Protection of Privacy Certificate Program offered by the Department of Extension, University of Alberta. This program has been endorsed by most Information and Privacy Commissioners in Canada. It is rapidly becoming a standard for access and privacy coordinators across Canada.

- Approximately one third of FOIP Coordinators do not have ready access to texts, conference materials, periodicals or internet list serves dealing with access and privacy.

If the rights of Saskatchewan residents to access and privacy guaranteed by the FOIP Act and LA FOIP Act are to be meaningful, there will have to be a significantly greater emphasis placed on the education of government employees. For reasons detailed in the *Report on the Overarching Privacy Framework for Executive Government*[3], the training provided to date by the Public Service Commission is inadequate. That training material fails to provide detailed, balanced information on the access to information obligations in the FOIP and LA FOIP Acts. It also provides confusing messages that muddy rather than clarify what these statutes require of public sector employees. We repeat and incorporate by reference the 15 specific recommendations in our Report available at www.oipc.sk.ca under the "What's New" tab.

[3]Available online at www.oipc.sk.ca

PRIVATE SECTOR PRIVACY

Our office has received a significant number of inquiries from Saskatchewan organizations concerning *The Personal Information Protection and Electronic Documents Act* (PIPEDA). This federal law has been in force since January 1, 2001 but the scope was restricted and it applied to very few Saskatchewan businesses. Effective January 1, 2004, the scope was substantially expanded so that it applies to the collection, use and disclosure of personal information in the course of "commercial activities" anywhere in this province.

With respect to many of these inquiries, we were able to establish that PIPEDA did not apply to the particular organization in question. It is clear that PIPEDA will not apply to Departments, Crown Corporations, Regional Health Authorities, Municipalities, Schools or Post-Secondary Institutions so long as they are dealing with personal information in connection with their core activities. In addition, contractors that collect, use or disclose personal information under the control of one of those bodies will be subject to either *The Freedom of Information and Protection of Privacy Act* or *The Local Authority Freedom of Information and Protection of Privacy Act*.

PIPEDA allows a province to displace that law by enacting "substantially similar" legislation. A substantially similar law could be a narrower sectoral law or a privacy law of general application. Saskatchewan proclaimed *The Health Information Protection Act* on September 1, 2003. There has been no determination as to whether that law will be declared by the Federal Cabinet to be "substantially similar" to PIPEDA. In the absence of such a declaration, health information trustees who collect, use or disclose personal health information in the course of commercial activities will be subject simultaneously to both HIPA and to PIPEDA. This poses some difficulties for those trustees, such as physicians in their own clinics, laboratories, private diagnostic facilities, pharmacies and dentists who are clearly engaged in commercial activities. Regional health authorities and other provincial agencies such as the Saskatchewan Cancer Agency would not qualify as carrying on "commercial activities". The difficulty is at least two-fold: An aggrieved patient may launch a complaint to the Privacy Commissioner of Canada pursuant to PIPEDA and may launch a complaint to our office in respect of the same alleged breach of privacy. In addition, there are some significant differences between the federal and provincial laws. PIPEDA is consent-driven, HIPA is not. HIPA employs a deemed consent model even for the sharing of personal health information for some secondary purposes. A secondary purpose would be a purpose not directly related to the provision of care to that particular patient.

There has been considerable discussion with the Privacy Commissioner of Canada with respect to how common complaints can best be addressed. Section 13(2)(b) provides that the Privacy Commissioner is not required to prepare a report if she is satisfied that "*the complaint could more appropriately be dealt with, initially or completely, be means of a procedure provided for under the laws of Canada, other than this Part, or the laws of a province*"

PRIVATE SECTOR PRIVACY (CONTINUED)

To address specific concerns of health providers, Industry Canada has produced the *PIPEDA Awareness Raising Tool* (PART) document.[4] This offers clarification and interpretative advice that works to narrow the apparent differences between the federal law and HPA. There is still a gap insofar as the sharing of personal health information for many secondary purposes is concerned.

Aside from health information, there is no provincial law to displace the application of PIPEDA to most business organizations and non-profits that carry on commercial activities. By default PIPEDA applies to those organizations. There are at least two problems with that default regime.

PIPEDA applies only to customer type information and does not apply to employee information of businesses other than those that are federally regulated such as airlines and banks. Our office is of the view that the most sensitive personal information that most businesses would have would relate to employees and not to customers. The provinces of British Columbia and Alberta have enacted private sector privacy laws that provide full coverage of employees and employee information. This legislative 'gap' in Saskatchewan warrants the early attention of the Legislative Assembly.

In addition, PIPEDA is a law that presents considerable challenge to small and medium sized businesses. Since it is really an attempt to take a voluntary code (the Canadian Standards Association Model Code for the Protection of Personal Information)[5] and give it the coercive authority of a statute, the language tends to be quite general and non-prescriptive. This has posed interesting challenges for large airlines and chartered banks endowed with significant resources. A small businessman in Saskatchewan is unlikely to have ready access to resources to achieve compliance with PIPEDA. Here again, the private sector privacy laws in British Columbia and Alberta have been carefully designed and supported to minimize compliance issues and problems.

Finally, the British Columbia/Alberta model addresses questions that have not been addressed by PIPEDA such as the grandfathering of legacy information and allowance for the sharing of customer information, under appropriate safeguards, in the circumstance of the proposed sale or merger of a business.

We recommend that the Legislative Assembly carefully evaluate the British Columbia/Alberta model of private sector privacy regulation for possible adaptation in this province. At the very least, if the Saskatchewan Legislative Assembly ultimately decides to allow PIPEDA to apply to Saskatchewan businesses in spite of the deficiencies and associated problems with that federal law, this should be only after a thorough and informed analysis of the available alternatives.

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[4] http://e-com.ic.gc.ca/epic/internet/inecic-ceac.nsf/en/gv00235e.html

[5] CAN/CSA-Q830-96

HEALTH INFORMATION PROTECTION ACT

On September 1, 2003 Saskatchewan became only the third province in Canada to bring into force a stand-alone health information law. The Act received Third Reading in 1999 and has only been partially modified by amendments in the spring of 2003. Given the unusually long gestation period for HIPA, it is surprising that there is such a lengthy list of outstanding items for full implementation.

The absence of regulations is certainly problematic. There was also a July 30, 2003 letter written by the Department of Health to major trustees advising them that there would be a "grace period". The "grace period" was expressed only in terms of a possible prosecution under the offence and penalty provisions of HIPA but has apparently been widely understood by trustees as a grace period for all enforcement activity under the statute. There was no date when the "grace period" would expire. The combination of the grace period message from Sask. Health and the absence of regulations have combined to send the wrong message to trustees. The message is that compliance with HIPA is not a matter of urgent attention. Since it is our office that is charged with oversight of HIPA, we have been required to attempt to signal to trustees that compliance is important and must not be postponed or delayed.

Saskatchewan Health has worked very hard to build consensus among trustees on the types of tools necessary for implementation of HIPA. That is an important value and a noble goal. Nonetheless, it has been many months since this new law came into force and the pace of implementation is too slow. HIPA sets out important rights for patients in terms of the protection of their most sensitive personal data. This takes on added importance as this province moves towards an electronic health record – a development described in the Fyke Report as the "cornerstone of an efficient and responsive health care delivery system".[6]

We recommend that the Department reevaluate the resources currently available to promote HIPA compliance and awareness. We recommend that additional resources be allocated to ensure that this province moves to full compliance without further delay.

It is important that the draft regulations under HIPA be produced as quickly as possible. We recommend that the regulations be published in draft form so that all Saskatchewan residents will have at least a thirty day period to provide feedback and comment. It is fundamentally important that public confidence in the protection of privacy by health information trustees be promoted and supported at every opportunity.

[6] Caring for Medicare: Sustaining a Quality System, Saskatchewan Health, April 2001, p.68

HEALTH INFORMATION PROTECTION ACT
(CONTINUED)

The training challenge posed by HIPA eannot be overstated. We strongly recommend that a health information conference be organized in Saskatchewan as quickly as possible. This should be designed to encourage attendance by persons employed by all regional health authorities and all health provider groups, all Departments and Crown Corporations. This should offer lessons from the 5 years experience in Manitoba with *The Personal Health Information Act*, and the 3 years experience in Alberta with the *Health Information Act* but all of this through a Saskatchewan-specific filter.

PRIVACY IMPACT ASSESSMENT

A Privacy Impact Assessment ("PIA") is a diagnostic tool designed to help organizations assess their compliance with the privacy requirements of Saskatchewan legislation. The design reflects the requirements of the three Saskatchewan statutes:

1. *Freedom of Information and Protection of Privacy Act* ("FOIP")
2. *Local Authority Freedom of Information and Protection of Privacy Act* ("LA FOIP")
3. *Health Information Protection Act* ("HIPA")

Utilization of this tool is not required, or mandated by present provincial legislation. Trustees, government institutions and local authorities are, however, required to comply with the above referenced legislation and the PIA can be used to that end.

Those organizations developing or revising a program or practice can use the PIA if it involves or affects personal information. The PIA is also useful when reviewing privacy implications of an existing program.

Organizations that are subject to the federal *Personal Information Protection and Electronic Documents Act* ("PIPEDA") may also choose to use this PIA to assist with efforts to comply with that law. The Saskatchewan Commissioner does not oversee PIPEDA. If more information about PIPEDA and necessary steps to comply with that law is required, the Privacy Commissioner of Canada (www.privcom.gc.ca) should be contacted.

The *PIA Short Form* is available on the OIPC website.

PRIVACY FRAMEWORK

We have published a full report that details our concerns with this Government initiative that was announced September 2, 2003. This *Report on the Overarching Privacy Framework for Executive Government* was tabled in the Assembly on June 17, 2004. The Report includes 15 specific recommendations for Executive Government. This Report can be accessed at our website: www.oipc.sk.ca.

VIDEO SURVEILLANCE

This office produced a guide entitled, *Guidelines for Video Surveillance by Saskatchewan Public Bodies* in June 2004. The Guide contemplates the use of video surveillance by public bodies (government institutions, local authorities, and health information trustees) in Saskatchewan and offers 10 guidelines to consider before introducing video surveillance practices.

In addition, the Guide reinforces the need of video surveillance practices to comply with provincial privacy laws such as *The Freedom of Information and Protection of Privacy Act*, *The Local Authority Freedom of Information and Protection of Privacy Act*, and *The Health Information Protection Act*.

PROCESS FOR REVIEWS AND INVESTIGATIONS

Our office has made a number of changes to the process to deal with reviews and investigations under the various statutes. We produced the document entitled *Helpful Tips* to assist parties in preparing for a formal review. This was intended to address what had been a lack of uniformity in the preparation of the record and the written submission of the parties to a review.

In a number of areas, our office believes the FOIP and LA FOIP Acts are deficient. We have recommended in another portion of this Report that the statutes be reviewed by an all-party MLA Committee and that the Committee make recommendations on amendment of both instruments. In the meantime, our office has offered, by way of interpretative policy, the following guidance as to the approach this Office takes in interpreting and applying these two laws.

We take the purpose of both laws to be as follows:

Purpose clause:

To make public bodies more accountable to the public and to protect personal privacy by:

- Giving the public a right of access to records;
- Giving individuals a right of access to and the right to request correction of personal information about themselves;
- Specifying limited exceptions to the right of access;
- Preventing the unauthorized collection, use or disclosure of personal information by public bodies; and
- Providing for an independent review of decisions made under the legislation

We believe that to make the rights to access and privacy that are codified in the statutes meaningful, given the imbalance between applicants and public bodies, a duty on government institutions and local authorities to assist applicants must be implied. In our approach that duty to assist consists of the following:

There is an implicit duty on government institutions and local authorities to assist applicants. This includes taking reasonable steps to ensure they respond to access requests openly, accurately and completely. This parallels an explicit duty to assist in HIPA.

LEGISLATIVE REVIEW

We endorse the outstanding recommendations from the previous Commissioner for review and amendment of *The Freedom of Information and Protection of Privacy Act*. We suggest that an all-party Committee of the Legislative Assembly could consider both the FOIP Act and the LA FOIP Act but also the administration and operation of both laws. A FOIP regime includes a number of major elements. This would include the regulations, the policies and procedures, the training of public sector staff and matters necessarily incidental to administration of both laws.

The experience in other jurisdictions is recurrent evaluation of enacted legislation to ensure each law is addressing contemporary issues and challenges. This evaluation occurs publicly in the form of a legislative review. Since Saskatchewan's *The Freedom of Information and Protection of Privacy Act* and *The Local Authority Freedom of Information and Protection of Privacy Act* came into force in 1992 and 1993 respectively with neither having undergone a formal review, this process is overdue.

Our office compared the different models of legislative review utilized in Canadian jurisdictions including Alberta, British Columbia, Nova Scotia, and Manitoba. Prince Edward Island is also embarking on a review less than two years after its access and privacy law was proclaimed. The Yukon is contemplating changes to its legislation. The distribution of discussion papers, summaries, and news releases during the course of the reviews in those provinces raised awareness of the initiative. Participation was encouraged through public hearings, online questionnaires, and through the invitation for submissions. At the conclusion of the process, final reports presented recommendations with legislative amendments resulting. Support for the end result is more likely when all stakeholders have had their issues considered in an open, consultative process.

Recommendations for legislative amendment:

1. Consolidate both the FOIP and LA FOIP Act into a single instrument.

   - Saskatchewan is one of what we believe is two Canadian jurisdictions to have one law for government institutions and a separate one for local authorities. The provisions are very similar but the existence of two different laws makes for confusion and inefficiency.
   - A large local authority recently confused the two statutes and explained to our office after we raised the matter, that "Upon further review, it is apparent that *The Freedom of Information and Protection of Privacy Act* does not apply to the [local authority]. This seems clear from a review of the provisions of section 2(f)(vi) of *The Local Authority Freedom of Information and Protection of Privacy Act*. I can assure you and the applicant that the confusion was by way of a simple mistake as to which of these two highly similar pieces of legislation was operative in the circumstances. It was certainly not with a view to delay or prejudice the applicant."

LEGISLATIVE REVIEW (CONTINUED)

2. Expand exemption for solicitor-client privilege to include all kinds of legal privilege (probably 6 or 7 different kinds of privilege, either public interest privilege or case by case privilege) recognized at common law today.

3. Include police services and police commissions as local authorities as is the case with every other jurisdiction other than Prince Edward Island.

4. Include a duty to protect personal information such as:

   - The head of a government institution must protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction.

   - This is the most conspicuous gap in Part IV dealing with collection, use and disclosure of personal information. The gap is highlighted by the current efforts of the province to implement the Privacy Framework.

5. Create the power for the Commissioner to authorize a public body to disregard requests for access.

6. Clarify that independent officers are not government institutions.

7. Give the Commissioner the opportunity to delegate powers.

8. Make it an offence to deny access requests or to destroy documents for that purpose.

   - Example: A person must not willfully alter, falsify or conceal any record, or direct another person to do so, with the intent to evade a request for access or destroy any records subject to the Act or direct another person to do so with the intent to evade a request for access to the records.

9. Permit disclosure of personal information for 'shared services' such as SCHOOLPLUS subject to appropriate safeguards.

10. Create an express duty to assist applicants.

    - Example: Head must make every reasonable effort to assist applicants and to respond to each applicant openly, accurately and completely.

11. Include a Purpose Clause in the statute.

LEGISLATIVE REVIEW (CONTINUED)

12. Strengthen and revise the paramountcy provision so it applies to the entire Act.

13. Include the right to make a continuing request for access.

14. Include a public interest override provision that imposes a positive duty on a head to disclose in case of significant risk to public health or safety or where there is a compelling public interest.

15. Narrow the exception in section 30(2) when individual seeks own information.

16. Expressly give the Commissioner the power to review fees and fee estimates.

17. Make the Information and Privacy Commissioner office an administrative tribunal instead of an ombudsman.

18. Allow the government institution to give the opportunity to an applicant to examine the record even if it is reasonable to produce a copy.

19. Require the government institution to create a record for an applicant if the record can be created from a record that is in electronic form and in the custody or under the control of a public body, using its normal computer hardware and software and technical expertise, and creating the record would not unreasonably interfere with the operations of the public body.

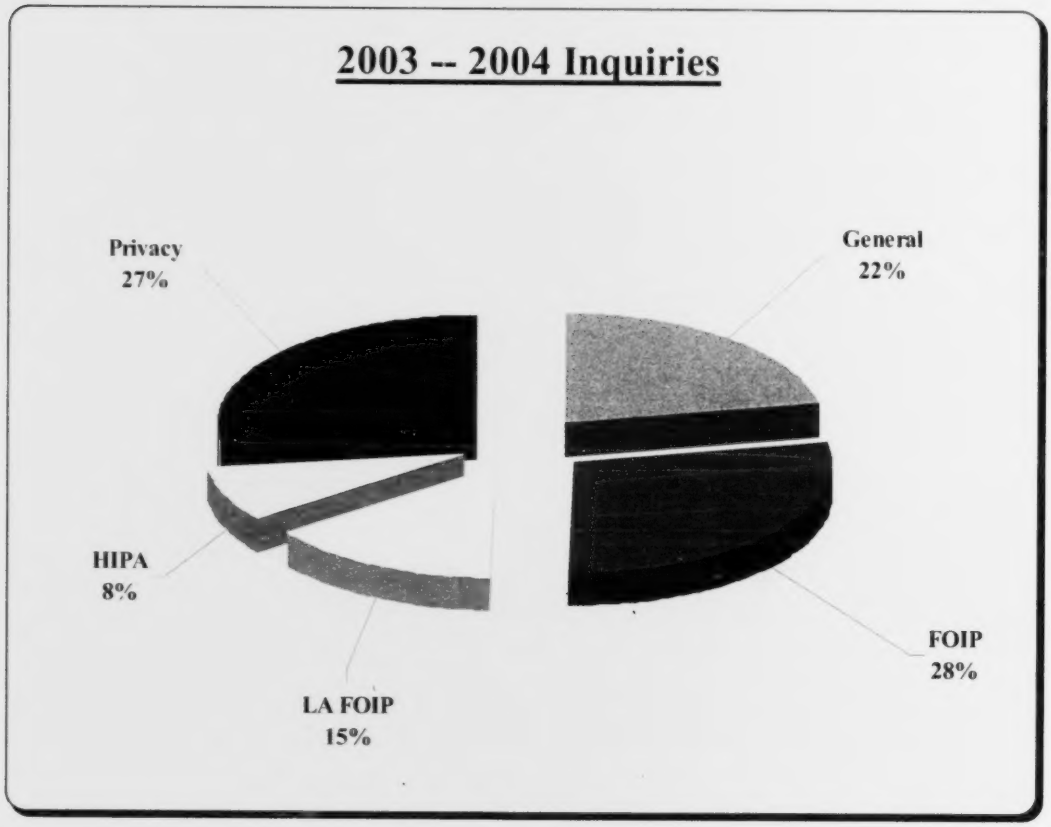
20. Define "lawful investigation".

21. Consider qualifying the right to refuse access in the event of perceived danger to physical or mental health of an individual by requiring advice from a psychiatrist, psychologist or other appropriate expert.

22. Develop a "business card" exception to the definition of personal information insofar as provincial government employees is concerned.

23. Require that notice of a correction of personal information be provided to any third party that had been supplied with the erroneous information within the past 12 months.

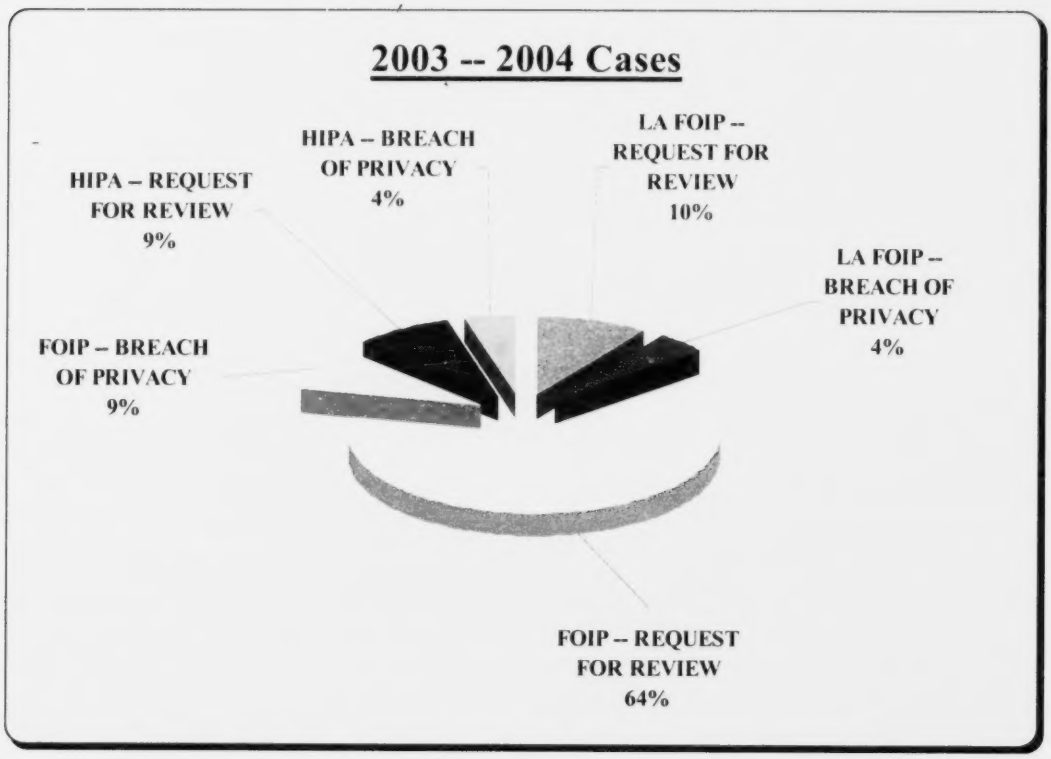
STATISTICS



There has been a 50% increase in the number of inquiries from the 2002-2003 fiscal year.

FISCAL YEAR	NUMBER OF INQUIRIES
2002 – 2003	428
2003 – 2004	641

STATISTICS

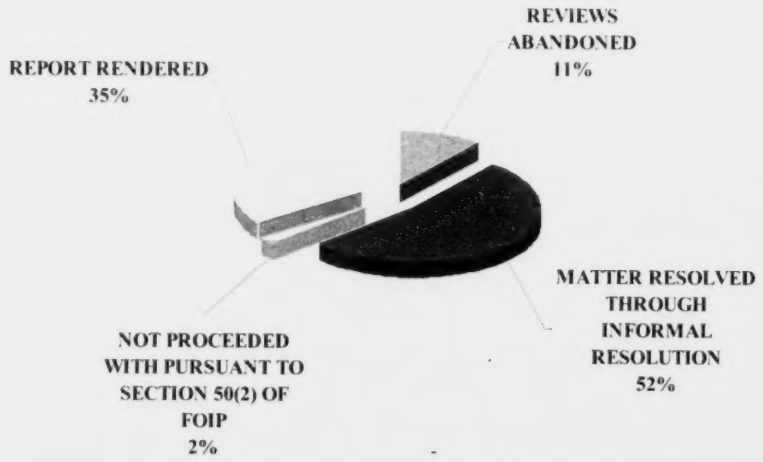

2003 -- 2004 Cases
HIPA – BREACH OF PRIVACY 4%
LA FOIP – REQUEST FOR REVIEW 10%
HIPA – REQUEST FOR REVIEW 9%
LA FOIP – BREACH OF PRIVACY 4%
FOIP – BREACH OF PRIVACY 9%
FOIP – REQUEST FOR REVIEW 64%

There has been a 23% increase in case files from the 2002-2003 fiscal year.

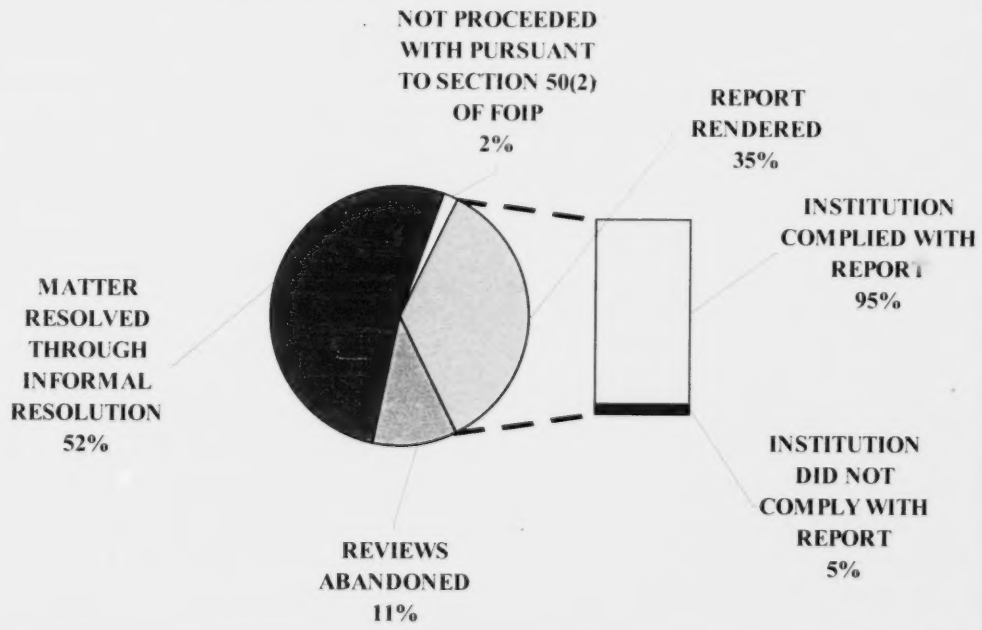
FISCAL YEAR	NUMBER OF INQUIRIES
2002 – 2003	75
2003 – 2004	92

STATISTICS (CONTINUED)

2003 -- 2004 Case Resolution


REVIEWS ABANDONED 11%
REPORT RENDERED 35%
MATTER RESOLVED THROUGH INFORMAL RESOLUTION 52%
NOT PROCEEDED WITH PURSUANT TO SECTION 50(2) OF FOIP 2%

2003 -- 2004 Case Resolution


NOT PROCEEDED WITH PURSUANT TO SECTION 50(2) OF FOIP 2%
REPORT RENDERED 35%
INSTITUTION COMPLIED WITH REPORT 95%
MATTER RESOLVED THROUGH INFORMAL RESOLUTION 52%
INSTITUTION DID NOT COMPLY WITH REPORT 5%
REVIEWS ABANDONED 11%

FINANCIAL STATEMENTS
AS AT MARCH 31, 2004

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NOTES TO THE FINANCIAL STATEMENTS ..... PAGES 34 -- 35

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SASKATCHEWAN

AUDITOR'S REPORT

To the Members of the Legislative Assembly of Saskatchewan

I have audited the statement of financial position of the Office of the Information and Privacy Commissioner as at March 31, 2004 and the statements of operations, change in net debt and cash flows for the year then ended. The Office is responsible for preparing these financial statements. My responsibility is to express an opinion on these financial statements based on my audit.

I conducted my audit in accordance with Canadian generally accepted auditing standards. Those standards require that I plan and perform an audit to obtain reasonable assurance whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation.

In my opinion, these financial statements present fairly, in all material respects, the financial position of the Office of the Information and Privacy Commissioner at March 31, 2004 and the results of its operations, and its cash flows for the year then ended in accordance with Canadian generally accepted accounting principles.

Regina, Saskatchewan
May 5, 2004

Fred Wendel, CMA, CA
Provincial Auditor

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER
STATEMENT OF FINANCIAL POSITION
As at March 31

	2004	2003
Financial assets		
Due from the General Revenue Fund	$ 35,733	$ 4,710
Liabilities		
Accounts payable	30,014	4,710
Accrued vacation pay	5,719	---
Net debt	---	---
Non-financial assets		
Tangible capital assets (Note 3)	40,558	---
Prepaid expenses	5,227	---
	45,785	---
Accumulated surplus	$ 45,785	$ ---

(See accompanying notes to the financial statements)

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER
STATEMENT OF OPERATIONS
For the Year Ended March 31

	2004		2003
	Budget (note 4)	Actual	Actual
Revenue:			
General Revenue Fund -Appropriation	$ 306,000	$ 295,210	$ 120,967
Total revenue	306,000	295,210	120,967
Expenses:			
Salaries & other employment expenses	148,000	112,336	63,064
Office rent	40,000	27,390	29,613
Equipment rental	2,000	1,424	1,183
Telephone	4,000	4,018	2,934
Legal services	27,000	20,940	15,919
Office expenses	2,000	3,423	---
Professional dues and fees	1,000	2,320	---
Supplies	4,500	9,171	1,476
Advertising & promotion	17,000	4,413	1,008
Travel, meals & accommodations	9,000	11,397	2,932
Meals and Entertainment	---	782	---
Relocation Expense	---	22,388	---
Repairs & maintenance	---	218	---
Contractual Services	---	8,995	1,926
Subscriptions	---	2,177	---
Computer software expense	---	5,008	---
Amortization	---	10,140	---
Printing and Postage	500	2,885	912
Total expense	$ 255,000	$ 249,425	$ 120,967
Annual surplus for the year	$ 51,000	45,785	---
Accumulated surplus - beginning of year		---	---
Accumulated surplus - end of year		$ 45,785	$ ---

(See accompanying notes to the financial statements)

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER
STATEMENT OF CHANGE IN NET DEBT
For the year ended March 31

	2004	2003
Annual surplus	$ 45,785	$ ---
Acquisition of capital assets	(50,698)	---
Amortization of capital assets	10,140	---
	(40,558)	---
Acquisition of prepaid expense	(5,227)	---
	(45,785)	---
(Increase) in net debt	---	---
Net debt, beginning of year	---	---
Net debt, end of year	$ ---	$ ---

(See accompanying notes to the financial statements)

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER
STATEMENT OF CASH FLOWS
For the Year Ended March 31

	2004	2003
Operating transactions		
Cash received from:		
General Revenue Fund Appropriation	$ 264,187	$ 116,257
	264,187	116,257
Cash paid for:		
Salaries	106,617	63,064
Supplies and other	106,872	53,193
	213,489	116,257
Cash provided by operating transactions	50,698	---
Capital transactions		
Cash used to acquire tangible capital assets	(50,698)	---
Cash applied to capital transactions	(50,698)	---
(Decrease) Increase in cash and cash equivalents	---	---
Cash and cash equivalents, beginning of year	---	---
Cash and cash equivalents, end of year	$ ---	$ ---

(See accompanying notes to the financial statements)

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER
NOTES TO THE FINANCIAL STATEMENTS
MARCH 31, 2004

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1. Authority and description of operations

The Freedom of Information and Protection of Privacy Act states that the Lieutenant Governor in Council, on the recommendation of the Assembly, shall appoint an Information and Privacy Commissioner. The Commissioner is an officer of the Legislative Assembly and is appointed by resolution. The mandate of the Office is to review Government decisions under *The Freedom of Information and Protection of Privacy Act* to ensure the protection of the public's right to access records held or controlled by the Government and to ensure that personal information is only collected and disclosed according to the manner and purposes set out in the Act.

2. Summary of accounting policies

The Office of the Information and Privacy Commissioner (Office) used Canadian generally accepted accounting principles to prepare these financial statements. The following accounting policies are considered to be significant:

a) Basis of accounting
The financial statements are prepared using the expense basis of accounting.

b) Revenue
The Office receives an appropriation from the Legislative Assembly to carry out its work. General Revenue Fund appropriations are included in revenue when amounts are spent or committed. The Office's expenditures are limited to the amount appropriated to it by the Legislative Assembly

c) Tangible capital assets
Tangible capital assets are reported at cost less accumulated amortization. All tangible capital assets are amortized on the straight-line basis over a life of 5 years.

d) Accrued vacation pay
The value of vacation entitlements earned to the year-end but not taken are recorded as a liability.

3. Tangible capital assets

	2004			2003		
Type	Cost	Accumulated Amortization	Net Book Value	Cost	Accumulated Amortization	Net Book Value
Computer Hardware	$ 21,285	$ 4,257	$ 17,028	$ —	$ —	$ —
Furniture	29,413	5,883	23,530	—	—	—
Total	$ 50,698	$ 10,140	$ 40,558	$ —	$ —	$ —

4. Budget

These amounts represent funds appropriated by the Board of Internal Economy to enable the Office to carry out his duties under *The Freedom of Information and Protection of Privacy Act.*

5. Costs borne by other agencies

The Office has not been charged with certain administrative costs. These costs are borne by the Legislative Assembly. No provision for these costs is reflected in these financial statements.

6. Lapsing of appropriation

The Office follows *The Financial Administration Act, 1993* with regards to its spending. If the Office spends less than its appropriation by March 31, it must return the difference to the General Revenue Fund.

7. Financial Instruments

The Office's financial instruments include due from the General Revenue Fund and accounts payable. The carrying amount of these instruments approximates fair value due to their immediate or short-term maturity. These instruments have no significant interest rate and credit risk.

8. Transfer to General Revenue Fund

The Financial Administration Act, 1993 requires that any unspent appropriations be returned to the Minister of Finance.

APPENDIX A -- DEFINITIONS

The following is a list of definitions of terms or abbreviations used in the course of this document or referenced in documents accessible from the website: www.oipc.sk.ca.

Additional definitions are found in the three provincial statutes: *The Freedom of Information and Protection of Privacy (FOIP) Act, The Local Authority Freedom of Information and Protection of Privacy (LA FOIP) Act* and *The Health Information Protection Act (HIPA).*

Applicant refers to an individual who has made an access request to a government institution, local authority, or health information trustee.

Commissioner refers to the Saskatchewan Information and Privacy Commissioner.

The **Complainant** is an aggrieved individual who makes a formal request to the Office of the Information and Privacy Commissioner to investigate an alleged "unreasonable invasion of privacy" of that public body pursuant to sections 33 of The FOIP Act, 32 of The LA FOIP Act, or 52 of The HIPA.

Complaint is an expressed concern that there has been a breach of privacy by a public body.

Control is a term used to indicate that the records in question are not in the physical possession of the public body, yet still within the influence of that body via another mechanism (i.e. contracted service).

Custody is the physical possession of a record by a public body.

Disclosure is sharing of personal information with a separate entity, not a division or branch of the public body in possession or control of that record/information.

Exemptions are sections of the relevant statutes referenced to justify the denial of access to records by the individual either for mandatory or discretionary reasons.

The **FOIP Coordinator** is an individual designated for managing access and privacy issues in any public body with this title.

FOIP Regime means the statute, regulations, practices and procedures followed in the operation of the statutes.

Government institutions refer to those prescribed in the FOIP Act and Regulations and include more than 70 provincial government departments, agencies, and Crown Corporations.

APPENDIX A – DEFINITIONS (CONTINUED)

The **head** of a public body is accountable by law for making the final decision on access requests, but may delegate these powers to someone else in the organization. This is typically the Minister of a department and the CEO of a local authority or Crown Corporation.

Local Authorities means local government including library boards, municipalities, regional colleges, schools, universities, and Regional Health Authorities as prescribed by the LA FOIP Act and Regulations.

Mediation is the process of facilitating discussion between the parties involved in an informal investigation by the OIPC with the goal of negotiating a mutually acceptable resolution to the dispute without the issuance of a formal report.

OIPC is an abbreviation for the Office of the Information and Privacy Commissioner of Saskatchewan.

Personal information is "recorded information about an identifiable individual" and includes details such as your name, address, phone number, SIN, race, driver's license number, health card number, credit ratings, and opinions of another person about you.

Personal health information includes information about your physical or mental health and/or information gathered in the course of providing health services for you.

PIA is an abbreviation for a Privacy Impact Assessment. A PIA is a diagnostic tool designed to help organizations assess their compliance with the privacy requirements of Saskatchewan legislation.

Public Bodies are those in the public sector including government institutions and local authorities.

A **record** is information in any form or format and includes such items as documents, maps, books, post-it notes, handwritten notes, phone messages, photographs, and tape recordings.

A **report** is a document prepared by the Saskatchewan Information and Privacy Commissioner that issues recommendations to a public body for changes and/or actions in response to the findings of a formal review.

Third Party is a person other than the applicant or the public body.

Trustees as defined within section 2(t) of HIPA are individuals and corporations who are part of Saskatchewan's health system in custody or control of personal health information.

Use indicates the internal utilization of personal information by a public body.

APPENDIX B – SAMPLE LIST OF PRESENTATIONS

SAMPLE OF PRESENTATIONS MADE FROM OCTOBER 1ST, 2003 TO MARCH 31ST, 2004

- Canadian Bar Association, Corporate Counsel Section, Regina
- Canadian Bar Association, Mid-Winter Meeting, Regina
- Office of the Children's Advocate, Saskatoon
- City of Saskatoon, City Clerk, Legal Department, Saskatoon
- Corrections & Public Safety, Privacy Coordinators, Regina
- Financial Executives
- Heintze Institute, Saskatoon
- Human Resource Development Canada (HRDC) Assessment & Review Committee, Regina
- Institute of Internal Auditors, Regina
- Institute of Public Policy, Regina
- Insurance Institute of Saskatchewan, Regina
- Insurance Institute of Saskatchewan, Saskatoon
- Journalists' Institute on Parliamentary Democracy, Regina
- Legislative Internship Program, Regina
- Mental Health and Addictions, Saskatoon
- MLA Orientation, Regina
- Ombudsman's Office
- Regina Rural Municipal Administrators Association, Moose Jaw
- Rural Municipal Administrators Association, Swift Current
- Saskatchewan Abilities Council, Saskatoon
- Saskatchewan Crown Corporations, Privacy Officers and Legal Counsel, Regina
- Saskatchewan Health Information Network (SHIN) Privacy Group, Regina
- Saskatchewan Health Leadership Council, Regina
- Saskatoon Regional Health Authority, Saskatoon
- Saskatoon Catholic School Division
- Saskatoon Police
- Saskatoon Star Phoenix Editorial Board
- Saskatoon Tribal Council, Health & Social Development Directors, Saskatoon
- SaskCulture, Regina
- SaskCulture, Saskatoon
- Sunrise Health Region
- University of Regina, Faculty of Administration, Regina
- Wascana Centre Authority, Regina

APPENDIX C – LIST OF BODIES SUBJECT TO OIPC OVERSIGHT

GOVERNMENT INSTITUTIONS (70+)

LOCAL AUTHORITIES (includes the following:)

- SIAST (4 campuses)
- Universities (2)
- Libraries (589)
- Regional Colleges (9)
- Regional Health Authorities (13)
- School Divisions (82)
- Municipalities:
  - 13 cities and 478 other **urban municipalities** including:
    - 145 towns
    - 290 villages
    - 43 resort villages
  - Southern Saskatchewan has 296 **rural municipalities**
    - The rural municipalities include 166 organized hamlets.
  - In the Northern Saskatchewan Administration District there are:
    - 2 towns
    - 13 northern villages
    - 9 northern hamlets
    - 11 northern settlements

APPENDIX C – LIST OF BODIES SUBJECT TO OIPC OVERSIGHT

SASKATCHEWAN HEALTH TRUSTEES INCLUDE
(Others which may be added through regulations):

- Government Institutions
  - 17 Departments
  - 76 Crown Corporations and Agencies
- Regional Health Authorities and Affiliates
  - 13 health authorities
- Special Care Homes
- Personal Care Homes
- Mental Health Facilities
- Laboratories
- Pharmacies
- Community Clinics
- Saskatchewan Cancer Agency
- Ambulance Operators
- Regulated Health Professions
  - 1500 physicians and surgeons
  - 9000 registered nurses
- Health Profession Regulatory Bodies
  - Chiropractors Association of Saskatchewan
  - College of Dental Surgeons of Saskatchewan
  - College of Physicians and Surgeons of Saskatchewan
  - Dental Technicians Association of Saskatchewan
  - Denturist Society of Saskatchewan
  - Registered Psychiatric Nurses Association of Saskatchewan
  - Saskatchewan Association of Chiropodists
  - Saskatchewan Association of Licensed Practical Nurses
  - Saskatchewan Association of Medical Radiation Technologists
  - Saskatchewan Association of Optometrists
  - Saskatchewan Association of Speech/Language Pathologists and Audiologists
  - Saskatchewan College of Physical Therapists
  - Saskatchewan College of Psychologists
  - Saskatchewan Dental Assistants Association
  - Saskatchewan Dental Hygienists Association
  - Saskatchewan Dental Therapists Association
  - Saskatchewan Dietitians Association
  - Saskatchewan Ophthalmic Dispensers Association
  - Saskatchewan College of Pharmacists
  - Saskatchewan Registered Nurses' Association
  - Saskatchewan Society for Medical Laboratory Technologists
- Saskatchewan Society of Occupational Therapists
- Saskatchewan Association of Social Workers